

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC, PATENT LITIGATION	§	Case No. 2:22-md-03042-JRG
THIS DOCUMENT RELATES TO CASE NO. 2:22-cv-00427-JRG	§	<u>JURY TRIAL DEMANDED</u>
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TAASERA LICENSING LLC,	§	Case No. 2:22-cv-00427-JRG
Plaintiff,	§	<u>JURY TRIAL DEMANDED</u>
v.	§	
MUSARUBRA US LLC, D/B/A TRELLIX,	§	
Defendant.	§	

JOINT MOTION TO FURTHER EXTEND THE STAY OF ALL DEADLINES

Plaintiff Taasera Licensing LLC (“Plaintiff” or “Taasera”) and Defendant Musarubra US LLC, d/b/a Trellix (“Trellix” or “Defendant”) (collectively, the “Parties”) hereby file this Joint Motion to Further Extend the Stay of All Deadlines.

All matters in controversy between the Parties have been settled in principle and, on January 4, 2024, the Parties jointly moved to stay all deadlines and provided notice of settlement (Dkt. 347). On January 5, 2024, this Court stayed the case until February 9, 2024 (Dkt. 349). On February 8, 2024, the Parties filed a Joint Motion to Extend the Stay of All Deadlines for thirty (30) days (Dkt. 352). On March 7, 2024, the Parties filed a Joint Motion to Further Extend the Stay of All Deadlines for thirty (30) days (Dkt. 358). On March 8, 2024, this Court granted the extension until April 10, 2024 (Dkt. 74 in the Member Case).

The Parties recognize the significant amount of time that has been spent consummating the settlement. The Parties respectfully and jointly request that the Court extend the stay of all case deadlines for seven additional days. The settlement agreement has been finalized and executed. As agreed in the settlement agreement, dismissal of the case requires certain performance which has yet to occur. The Parties expect such performance to occur within the next 48 hours, but request seven days to avoid the need to request any additional extension of the stay. The Parties do not anticipate requesting another stay of this action from the Court.

WHEREFORE, the Parties respectfully request that the Court enter the proposed order submitted with this motion as set forth above.

Dated: April 10, 2024

Respectfully submitted,

/s/ Alfred R. Fabricant

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***ATTORNEY FOR MUSARUBRA US LLC, d/b/a
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on April 10, 2024, a true and correct copy of the foregoing document has been served via electronic mail on all counsel of record.

/s/ Alfred R. Fabricant
Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that all counsel of record has met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ Alfred R. Fabricant
Alfred R. Fabricant